

REMARKS

In the Final Office Action dated June 7, 2006, the Examiner rejects claims 2 through 5, 20, 21, and 24 under 35 U.S.C. 103(a), as obvious over U.S. Patent Publication No. 2005/0114484 to Wilson *et al.* (“Wilson”) in view of U.S. Patent 6,941,321 to Schuetze *et al.* (“Schuetze”). Furthermore, the Examiner rejects claims 22 and 23 under 35 U.S.C. 103(a), as obvious over Wilson in view of U.S. Patent Publication No. 2002/0016786 to Pitkow *et al.* (“Pitkow”). Based on the following remarks, Applicants respectfully request that the Examiner to reconsider and withdraw all outstanding objections and rejections.

Regarding independent claim 24, Wilson and Schuetze, considered alone or in combination, fail to teach or otherwise suggest at least the claimed steps of identifying a set of global hosts for a plurality of websites, each global host not having a country-related domain; analyzing one or more inlinks to at least one global host from the set of global hosts to determine a countrytag for the at least one global host; and producing an augmented set of hosts that includes the set of country hosts, the at least one global host, and the corresponding countrytags for each country host and the at least one global host.

First neither Wilson nor Schuetze teach or suggest analyzing one or more inlinks to at least one global host from the set of global hosts to determine a countrytag for the at least one global host as claimed. The Examiner relies on ¶ 31 of Wilson for support of “at least one global host from the set of global host to determine a countrytag for the least one global host”. Ascertaining the differences between the prior art and the claims at issue, however, requires an interpretation of the claim language and consideration of both the invention and the prior art references as a whole. See MPEP Section 2111 - Section 2116.01. In the instant case, Applicants respectfully assert that the Examiner is improperly considering the partial claim element of “at least one global host from the set for global host to determine a countrytag for the at least one

global host” independently of “analyzing one or more inlinks to,” which is incorrect in the instant claim element where the determination is dependent on analyzing one or more inlinks to at least one global host. Regardless, the combination of Wilson and Schuetze fails to teach or suggest the claim element as a whole. At best, Wilson discusses assigning country domains when creating a domain hierarchy for various countries, which is done independent of analyzing one or more inlinks to at least one global host. By contrast, claim 24 describes analyzing one or more inlinks to at least one global host from the set of global host to determine a countrytag for the at least one global host.

The examiner further asserts that Schuetze teaches one or more inlinks. Col. 2, lines 43 through 56. Schuetze, however, fails to overcome the deficiencies of Wilson. Specifically, Schuetze, at best, discusses the concept of an inlink to a given page but fails to teach or suggest analyzing one or more inlinks to a global host from the set of global hosts.

In addition to the foregoing, Wilson fails to teach or suggest the claimed element of producing an augmented set of hosts that includes the set of country hosts, the at least one global host, and the corresponding countrytags for each country host and the at least one global host. According to one embodiment, Wilson discusses that higher level domain names are created in order to extend an existing domain system by creating additional domains, whereby businss.com can be modified to create the higher level domains top.business.com and go.business.com. Additionally, country names can be added to the base domains, (e.g. shop.jp.com and shop.us.com) in order to define respective host’s country. Wilson at ¶ 31. By contrast with independent claim 24, however, embodiments of Wilson only discuss an extension of a country code to a base level domain host, not producing an augmented set of hosts that

includes the set of country hosts, the at least one global host, and the corresponding countrytags for each country host and the at least one global host.

The Examiner also asserts that Wilson teaches identifying a set of country hosts for a plurality of websites, each country host having a country-related domain; assigning a countrytag to each country host that corresponds to the country-related domain for the respective country host. Wilson ¶¶60 through 70. Wilson, however, fails to discuss the claimed element of producing an augmented set of hosts that include the set of country hosts, the at least one global host, and corresponding countrytags for each country host and the at least one global host.

Emphasis added. More specifically, Wilson's discussion of New Top Level Domain Explanations (¶¶ 60 through 70) is a separate and distinct embodiment in contrast with the Higher Level Domain System (¶¶ 30 through 31). The former discusses new top level domain names and is country specific, while the latter adds additional country definitions to existing domains in order to create more available domains. Consequently, there is no augmented set of hosts including both the country host and the global host and the corresponding countrytags for each country host and the at least one global host. Indeed, the references upon which the Examiner relies are silent regarding a countrytag. Accordingly, Applicants respectfully submit that independent claim 24 is patentable over Wilson and Schuetze, either alone or in combination, and request withdrawal of the rejection regarding the same.

With respect to independent claims 22 and 23, Wilson fails to teach or suggest assigning a countrytag to a global host of the website when the following are true: there are more unique inlinking hosts from country code top-level domains than from global domains, there are more than a predetermined number of unique inlinking hosts from country code top-level domains, and there are more than a predetermined percentage of unique inlinking hosts from a

same country code top-level domain. Wilson, at best, discusses assigning new country codes as top level domains representing various countries. This assignment, however, is not a condition in accordance with the claimed element, specifically, “*when all the following claim elements are true*”. Moreover, the Examiner concedes that Wilson does not teach the conditional statement as Pitkow is relied upon to teach the claimed conditions. Pitkow, however, fails to overcome the deficiencies of Wilson.

Examiner asserts that ¶ 0133 of Pitkow discusses that “there are more unique linking hosts from country code top-level domains than from global domains.” Pitkow, however, discusses a hierarchical search system, wherein the user is able to search directly within a particular sub-category, provided they are aware of the existence of that subcategory. Pitkow ¶ 0113. At best, Pitkow discusses that top-level to bottom level domains are assigned with content descriptors, in a order that the hierarchical structure can be traversed, from the more general to the more specific. Pitkow ¶ 0113. In other words, the content descriptors are assigned to domains of Pitkow as a means to traverse through the hierarchical structure from a general concept to specific details. This does not satisfy the claim element of “there are more unique inlinking hosts from country code top-level domains than from global domains”. That is, traversal from more general to more specific details is not the equivalent of more unique or less unique, and does not lead to a numeric amount that quantifies uniqueness.

More specifically, claims 22 and 23 discuss checking to determine whether there are more unique inlinking hosts from country code top-level domains than from global domains. A check that comprises “there are more” is a function comparing an amount – a numeric value or its equivalent – of unique inlinking host from country code top-level domains compared with an amount of inlinking host from global domains. Therefore, Pitkow, considered separately or in

combination with Wilson, fails to distinguish the uniqueness of inlinking hosts, their respective domains of origin, and the amount of unique of inlinking hosts as discussed in claim element of there are more unique inlinking hosts from country code top-level domains than from global domains. More importantly, Pitkow does not mention global domains or country code top-level domains.

Examiner further asserts that Pitkow discusses “there are more than a predetermined number of unique inlinking hosts from country code top level domains”. Pitkow ¶0118 and ¶0055. However, upon further review, Pitkow discusses personalized interest fields in term of various categories such as news, sports and entertainment. Pitkow ¶0118. Pitkow fails to discuss “there are more than a predetermined number of unique inlinking host from country code top level domains” as claimed. The personalized interest field of Pitkow merely serves as each individual user’s profile, acting as a record of a user’s interest and does not discuss the claimed elements.

The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the art of record. Given the Applicants’ position regarding the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

For at least the above reasons, Applicant submits that the present invention, as claimed, is patentable over the references upon which the Examiner is relying. Accordingly, reconsideration and allowance of pending claims 2 through 24 is respectfully solicited. To expedite prosecution, the Examiner is invited to contact the Applicants' undersigned representative at the number below.

Dated: September 7, 2006

I hereby certify that the correspondence attached herewith is being transmitted by first class mail to Mail Stop RCE, Commissioner for Patents, Box 1450/Alexandria, VA 22313-1450:

Susan Formicola

September 7, 2006

Date _____

Respectfully submitted,

By:

Seth H. Ostrow
Reg. No. 37,410

**BROWN RAYSMAN MILLSTEIN
FELDER & STEINER LLP**
900 Third Avenue
New York, New York 10022
Tel : (212) 895-2000
Fax: (212) 895-2900
Customer No. 29858